

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**HEATHER KIERNAN,
Plaintiff,**

v.

**ARMORED MOTOR SERVICES OF
AMERICA, INC. and FRANCISCO
CIAMBRIELLO,
Defendants.**

Civil Action No. 04-10131RBC

**DEFENDANT AMSA'S NOTICE OF GROUNDS OF OBJECTIONS TO PLAINTIFF'S
SUPPLEMENTAL LIST OF PROPOSED EXHIBITS AND WITNESSS**

Pursuant to the Court's Electronic Order granting the Joint Motion to Permit the Filing of a Supplemental List of Exhibits and Witnesses [Docket No. 76], Defendant AMSA hereby gives notice of her objections to Plaintiff's proposed supplemental exhibits and witnesses.

PLAINTIFF'S SUPPLEMENTAL EXHIBIT LIST

AMSA objects as follows to the supplemental exhibits Plaintiff has identified:

1. Armored Motor Services of America, Inc.'s Position Statement and Answer to MCAD Charge of Discrimination

Objection. Cumulative (FRE 611), Relevance (FRE 402); and Probative value outweighed by Prejudice, Confusion, or Waste of Time (FRE 403);
2. Defendant Francesco Ciambriello's Answer to the Complaint dated March 10, 2004:
Objection. Cumulative (FRE 611)
3. Complaint filed by Heather Kiernan dated January 20, 2004.
Objection. Hearsay (FRE 801), Cumulative (FRE 611), lack of personal knowledge

PLAINTIFF'S SUPPLEMENTAL WITNESS LIST

AMSA objects as follows to the supplemental witnesses identified by Plaintiff:

1. Diane L. Depippo, formerly at New Hope, Incorporated

Objection. Given that the parties have agreed to have the Plaintiff's records from New Hope, Inc. be entered into evidence without need for testimony by a Keeper of the Records, AMSA objects to the calling of Diane L. Depippo on relevance grounds (FRE 402) as Ms. Depippo did not meet, speak with, consult or treat Ms. Kiernan and therefore she has no personal knowledge and any testimony from her would be irrelevant to the issues being tried.

2. Officer Gerald Larsen

No objection

3. Officer Russell Castro

No objection

Respectfully submitted,

ARMORED MOTOR SERVICES OF AMERICA,
INC.,

By its attorneys,

/s/ Allison Romantz
Laurence J. Donoghue (BBO#130140)
Allison K. Romantz (BBO#554909)
MORGAN, BROWN & JOY LLP
200 State Street
Boston, MA 02109
(617) 523-6666

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 25, 2007.

/s/ Allison K. Romantz
Allison K. Romantz

